

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

In re

GEOSTELLAR, INC.,
Debtor(s).

Bankruptcy Case No. 18-00045
Chapter 7

MARTIN P. SHEEHAN, TRUSTEE,
Plaintiff,

v.

Adversary Proceeding No. 19-00024

DAVID ANDREW LEVINE and
INDECO UNION,
Defendant(s).

MOTION TO WITHDRAW AS COUNSEL

Pursuant to Rule 2091-1 of the United States Bankruptcy Court for the Northern District of West Virginia Local Rules, counsel for Defendant David A. Levine (“Mr. Levine”) submits this Motion to Withdraw as Counsel, and for the following reasons requests that the Court enter the accompanying proposed order being submitted herewith:

1. Dunlap Bennett & Ludwig PLLC, including its counsel, Cortland C. Putbrese (collectively, “DBL”), appeared in this action as counsel for the Defendant, Mr. Levine.
2. DBL has provided Mr. Levine with all requisite information and notice of its withdrawal as required by Rule 2091-1(b)(2) prior to filing the instant Motion.
3. Mr. Levine retained additional counsel in this action, and his representation shall continue unimpeded.
4. On December 29, 2020, Joseph F. Butcher and George N. Stewart of the law firm, Zimmer Kunz, PLLC filed notices of appearance on behalf of Mr. Levine, and are Mr. Levine’s counsel of record. (*See* Dkt. Nos. 30 and 31.)
5. As mentioned, this Motion is accompanied by a proposed written order.

6. Upon entry of this proposed written order, Dunlap Bennett & Ludwig PLLC, including its counsel, Cortland C. Putbrese, shall be deemed immediately withdrawn as Mr. Levine's counsel in the above-captioned action and shall have no further obligation whatsoever to appear or represent Mr. Levine in this action.

Dated: January 11, 2021.

Respectfully submitted,

/s/Cortland C. Putbrese
Cortland C. Putbrese (WVSB No. 7780)
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CERTIFICATE OF SERVICE

I hereby certify that on this the 11th day of January 2021, I filed a copy of the foregoing Motion to Withdraw as Counsel electronically using the West Virginia E-Filing System, which will send notice of the filing to counsel for the parties to this action. Moreover, a true and accurate copy was served via email upon the following:

Debra A. Wertman, Esq.
Assistant United States Trustee
300 Virginia Street, East
Room 2025
Charleston, West Virginia 25301
(*via electronic mail*)

Martin P. Sheehan, *Trustee*
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/s/Cortland C. Putbresse
Cortland C. Putbresse, Esq.